

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET FOR THE PERIOD
FEBRUARY 1, 2024 THROUGH FEBRUARY 29, 2024

Debtor: LT Management LLC Applicant: Brown Rudnick LLP
Case No.: 23-12585 (MBK) Client: Official Comm of Talc Claimants
Chapter: 11 Case Filed: April 4, 2023

SECTION 1
FEE SUMMARY

☒ Post-Dismissal Monthly Fee Statement No. 3 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from February 1, 2024 through February 29, 2024
(the "Third Post-Dismissal Statement")

Total Fees: \$100,417.50¹
Total Disbursements: \$921.08
Minus 20% holdback of Fees (\$20,083.50): \$80,334.00
Total Amount Sought To Be Paid at this Time: \$81,255.08

| NAME OF PROFESSIONAL & TITLE | YEAR ADMITTED (Or Years of Professional Service) | HOURS | RATE | FEE |
|---------------------------------|--|-------------|---------|---------------------|
| David J. Molton | Partner 1983 | 9.1 | \$2,250 | \$20,475.00 |
| Jeffrey L. Jonas | Partner 1988 | 1.7 | \$2,250 | \$3,825.00 |
| Michael S. Winograd | Partner 2001 | 32.8 | \$1,800 | \$59,040.00 |
| Susan Sieger-Grimm | Counsel 1994 | 8.5 | \$1,200 | \$10,200.00 |
| Michael W. Reining | Associate 2015 | 4.9 | \$975 | \$4,777.50 |
| Harriet E. Cohen | Paralegal | 4.2 | \$500 | \$2,100.00 |
| TOTALS | | 61.2 | | \$100,417.50 |

Fee Totals: \$100,417.50
Disbursements Totals: \$921.08
Total Fee Application \$101,338.58

¹ Brown Rudnick excluded fees in the amount of \$4,927.00 in respect of transient timekeepers and other voluntary reductions.

**SECTION II
SUMMARY OF SERVICES**

| SERVICES RENDERED | HOURS | FEE |
|---|--------------|-------------|
| a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries. | 0.0 | \$0.00 |
| b) Asset Disposition Sales, leases, abandonment and related transaction work. | 0.0 | \$0.00 |
| c) Avoidance Action Litigation Preference and fraudulent transfer litigation. | 0.0 | \$0.00 |
| d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems. | 0.0 | \$0.00 |
| e) Case Administration Coordination and compliance activities, including review of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries. | 0.0 | \$0.00 |
| f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims. | 0.0 | \$0.00 |
| g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan. | 0.0 | \$0.00 |
| h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures. | 3.3 | \$1,650.00 |
| i) Fee/Employment Objections Review of an objections to the employment and fee applications of others. | 0.0 | \$0.00 |
| j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis. | 0.0 | \$0.00 |
| k) Litigation General litigation and other contested matters. | 46.1 | \$82,185.00 |
| l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341 meeting and creditors' committee meetings. | 11.6 | \$16,342.50 |
| m) Plan and Disclosure Statement Formulation, analysis, presentation, and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims. | 0.0 | \$0.00 |

| SERVICES RENDERED | HOURS | FEE |
|---|--------------|------------|
| n) Relief from Stay Proceedings / Injunction Litigation in Adversary Proceeding Matters relating to termination or continuation of automatic stay under sections 362 and 105; matters relating to preliminary injunction and related appeals. | 0.0 | \$0.00 |
| o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis. | 0.0 | \$0.00 |
| p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies. | 0.0 | \$0.00 |
| q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries. | 0.0 | \$0.00 |
| r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc. | 0.0 | \$0.00 |
| s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc. | 0.0 | \$0.00 |
| t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current. | 0.0 | \$0.00 |
| u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns. | 0.0 | \$0.00 |
| v) Valuation Appraise or review appraisals of assets. | 0.0 | \$0.00 |
| w) Travel Time (billed @ 50%) | 0.0 | \$0.00 |
| x) Committee Governance Matters Analysis regarding committee governance matters, including creation of by-laws and addressing other governance matters. | 0.0 | \$0.00 |
| y) Investigation and Due Diligence Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action. | 0.0 | \$0.00 |
| z) Hearings Preparation for and attendance at hearings. | 0.0 | \$0.00 |
| aa) Mediation Preparation for and attendance at mediation. | 0.0 | \$0.00 |
| bb) Dismissal / Trustee / Examiner Matters Issues relating to motions to dismiss, motions to appoint an examiner or trustee, and related appeals as applicable. | 0.0 | \$0.00 |

| SERVICES RENDERED | HOURS | FEE |
|---|-------------|---------------------|
| cc) Meetings of Co-Counsel Preparing for and attendance at meetings of co-counsel and other TCC professionals to develop case strategy, coordinate actions items and prepare in advance of full committee meetings. | .2 | \$240.00 |
| SERVICE TOTALS: | 61.2 | \$100,417.50 |

**SECTION III
SUMMARY OF DISBURSEMENTS**

| DISBURSEMENTS | AMOUNT |
|--|-----------------|
| a) Filing Fees Payable to Clerk of Court. | \$275.01 |
| b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost. | \$0.00 |
| c) Pacer Fees Payable to the Pacer Service Center for search and/or print. | \$3.00 |
| d) Fax Include per page fee charged. | \$0.00 |
| e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges. | \$0.00 |
| f) In-house Reproduction Services Exclusive of overhead charges. | \$0.00 |
| g) Outside Reproduction Services Including scanning services. | \$0.00 |
| h) Other Research Title searches, UCC searches, Asset searches, Accurint. | \$0.00 |
| i) Court Reporting Deposition Services / Transcripts | \$0.00 |
| j) Travel Mileage, tolls, airfare, parking. | \$266.22 |
| k) Courier & Express Carriers Overnight and personal delivery. | \$0.00 |
| l) Postage | \$0.00 |
| m) Other (specify) Meals Meals. | \$376.85 |
| p) Other (specify) Expert Fees. | \$0.00 |
| q) Other (specify) eDiscovery Hosting. | \$0.00 |
| DISBURSEMENTS TOTAL: | \$921.08 |

I certify under penalty of perjury that the above is true.

Date: March 12, 2024

/s/ Gerard T. Cicero

BROWN RUDNICK LLP (“Brown Rudnick”) submits this Third Post-Dismissal Monthly Fee Statement of Brown Rudnick LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel for The Official Committee of Talc Claimants for the Period from February 1, 2024 through February 29, 2024 (“Third Post-Dismissal Monthly Fee Statement”), pursuant to the Order Establishing Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on May 22, 2023 [Docket No. 562] (the “Interim Compensation Order”).

WHEREFORE, Brown Rudnick respectfully requests payment of fees for the Third Post-Dismissal Monthly Fee Statement in the sum of \$80,334.00, together with expenses of \$921.08, for a total requested payment of \$81,255.08, in accordance with the terms of the Interim Compensation Order.

Dated: March 12, 2024

BROWN RUDNICK LLP
*Co-Counsel to the Official Committee
of Talc Claimants*

By: /s/ Gerard T. Cicero
GERARD T. CICERO

Exhibit “A”